

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Consider)	
Refinements to and Further Development of the)	Rulemaking 05-12-013
Commission's Resource Adequacy Requirements)	
Program.)	(Filed December 15, 2005)
_____)	

Order Instituting Rulemaking to Integrate)	
Procurement Policies and Consider Long-Term)	Rulemaking 06-02-013
Procurement Plans.)	
_____)	(Filed February 16, 2006)

**RESPONSE OF
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)
TO THE ASSIGNED COMMISSIONER'S RULING ADDRESSING
ELECTRIC RELIABILITY NEEDS IN SOUTHERN CALIFORNIA
FOR SUMMER 2007**

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I.

BACKGROUND

On August 15, 2006, Commission President Peevey issued the *Assigned Commissioner’s Ruling Addressing Electric Reliability Needs in Southern California For Summer 2007* (“ACR”) in the above-captioned dockets. The ACR acknowledged the various steps that are currently underway in numerous proceedings that combine the efforts of the California energy agencies, the California electric utilities, and other stakeholders to develop and enhance the State’s electric infrastructure to “meet the growing need for reliable, cost-effective and environmentally sound electric service.”

In light of the growth in electricity demand and the July 2006 heat wave, the ACR has directed that additional, immediate steps be taken to assure system reliability for 2007. Accordingly, the ACR directs Southern California Edison Company (“SCE”) to expand its Air Conditioning Cycling Program (“ACCP”) and to target the addition of 250 MW of quick-start, dispatchable generation for the summer of 2007. The ACR also directed Pacific Gas & Electric Company (“PG&E”) and San Diego Gas & Electric Company (“SDG&E”) to file “reports in Rulemaking 06-02-013 addressing the need for actions in their territories similar to those addressed in this ruling with respect to SCE, particularly with respect to air conditioning cycling.”¹

Pursuant to the Commission’s Rules of Practice and Procedure and Ordering Paragraph 2 of the ACR, SDG&E hereby files this response. In general, while generation on a statewide basis may have performed reasonably well during the July 2006 heat wave, the problem of aging infrastructure remains. Moreover, in SDG&E’s service area non-SDG&E reliability resources did not perform as expected during the recent heat wave.² Therefore, recognizing the Commission’s and other agencies’ concern over the grid’s ability to reliably meet electric demand in the summer of 2007, SDG&E will incorporate additional measures to expand and enhance its air conditioning cycling program, known as Summer Saver. In addition, and particularly in light of the poor performance of non-SDG&E peaking facilities in its service territory, SDG&E seeks Commission authority to add 250 MW of new peaking units to come on-line in 2007 and 2008. Towards that end, SDG&E will issue an expedited solicitation for market responses to address this need and will bring those projects to the Commission for further

¹ ACR, p. 7.

² SDG&E will follow up separately with the Commission regarding the poor peaker performance during the July heat wave.

review and expedited approval. This 250 MW would be an acceleration of part of the need to be filled through a long-term RFO that SDG&E intends to release later this year.

II.

GIVEN RECENT EVENTS, SDG&E WILL EXPAND ITS AC CYCLING PROGRAM AND RECOMMENDS TAKING STEPS TO ADD PEAKING RESOURCES

A. SDG&E will enhance its air conditioning program (Summer Saver) by the summer of 2007.

SDG&E is sensitive to the Commission's concerns regarding the possibility of demand spikes caused by a recurrence of a heat wave (in 2007 or 2008) similar to that experienced in July 2006 and, accordingly, will enhance its air conditioning program by the summer of 2007. As more fully discussed in its response to the *Assigned Commissioner's Ruling Requiring Utility Proposals To Augment 2007 Demand Response Programs*, dated August 9, 2006 (Demand Response ACR), enhancements to SDG&E's Summer Saver program are expected to occur by 2007.

With the enhancements proposed for its Summer Saver program, if approved, SDG&E expects to nearly double the size of the current program to 38 MW by early summer 2007. In total, SDG&E's expanded and enhanced demand response programs proposed in the Demand Response ACR, are expected to contribute an additional 114 MW in customer commitments that could be called on to reduce demand in SDG&E's service area during critical peak periods in 2007.

B. SDG&E will pursue adding new peaking resources to help alleviate the Commission's concerns regarding grid reliability.

SDG&E has already taken a number of steps to procure the resources needed to meet the increased electric demands in its service territory due to load growth. However, given the demand spikes related to the July 2006 heat wave and the poor performance of a number of non-SDG&E peaking units during that period, SDG&E recommends that the Commission authorize SDG&E to immediately add up to 250 MW of new, in-basin peaking resources. Towards this end, SDG&E will solicit offers from the market for new, utility-owned peaking resources for 2007 and 2008 and will present its findings to the Commission as soon as practicable for further review.

In considering this issue for SDG&E, it is important to note that SDG&E is currently dependent on well over 1,000 MW of generation resources that are at or near the end of their useful lives. Accordingly, to replace this generation as well as address other resource needs beginning in 2010, SDG&E is planning to issue a long-term RFO later this year. The 250 MW authorized here will simply serve to accelerate the resource additions that would be obtained through this long-term RFO to be released later in the year. If there is a repeat of this summer's hot weather next year, the new peaking resources will be integral to maintaining the reliability of the grid. In the event the hot summer is not repeated, the new peaking resources will nevertheless still serve to displace higher cost aging generation, providing savings to SDG&E's customers.

C. Expedited regulatory approvals are warranted.

SDG&E continues to support Commission use and adoption of forward-looking, competitive, and long-term solutions to meeting the energy needs of the State's utility customers. However, to quickly bring new peaking generation on-line as early as the

summer of 2007, SDG&E emphasizes that it will be essential for regulatory approvals (such as for transmission upgrades, environmental permits, and other siting requirements) to be issued quickly, in addition to express approval from this Commission to immediately add 250 MW of new peaking capacity.

In addition to securing the necessary expedited regulatory approvals, SDG&E also seeks authority to establish a memorandum account to record the costs associated with these new peaking generation resources. The final projects that result from this market solicitation process will be brought to the Commission for final approval and to address cost recovery and other issues associated with these resources.

Finally, SDG&E would also note that bringing new peaking projects on-line by summer 2007 may result in SDG&E temporarily exceeding the 15-17% planning reserve margin. The Commission should explicitly recognize that deviations along these lines are acceptable in this context to ensure that the new peaking units get built quickly for greater system reliability and as a hedge against future extreme events. Making this finding is also generally consistent with the Commission's prior recognition of the "lumpiness" of resource additions when it adopted the 15-17% planning reserve margin (see D.04-01-050, p. 22, COL 5).

III.

CONCLUSION

SDG&E appreciates and supports the Commission's efforts to ensure that the State's electric generation, transmission and distribution systems remain robust and reliably meet the needs of customers in a cost-effective and environmentally sound manner. SDG&E is doing its part by diligently incorporating new demand response,

energy efficiency and transmission projects, as well as long- and short-term resource solicitations that create a diversified portfolio consistent with evolving Commission policy. SDG&E expects to enhance its demand response programs, including SDG&E's Summer Saver program by the summer of 2007. In addition, SDG&E recommends that the Commission allow it to add up to 250 MW of new in-basin peaking capacity pursuant to an abbreviated market solicitation process and with expedited regulatory approvals as outlined herein.

DATED this 30th day of August, 2006, at San Diego, California.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the forgoing
**RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) TO THE
ASSIGNED COMMISSIONER'S RULING ADDRESSING ELECTRIC
RELIABILITY NEEDS IN SOUTHERN CALIFORNA FOR SUMMER 2007** on
each party named in the official service list for proceeding R.05-12-013 and R.06-02-013
by electronic mail to the parties for whom an electronic address has been provided and by
also mailing a properly addressed copy by first-class mail with postage prepaid. A copy
was mailed to Commissioner Michael R. Peevey and ALJs Carol A. Brown and Mark S.
Wetzell via FedEx.

Executed this 30th day of August, 2006 at San Diego, California.

 /s/ Deanna M. Porter
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CALIFORNIA PUBLIC UTILITIES COMMISSION

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Proceeding: R0512013 - CPUC - OIR TO CONSID

Filer: CPUC

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